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INTERVENTION

ARIZONA CORPORATION COMMISSION

RECEIVED
AZ CORP COMMISSION

ORIGINAL

CARL J. KUNASEK
CHAIRMANJIM IRVIN
COMMISSIONERTONY WEST
COMMISSIONER

MAY 27 3 30 PM '99

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
APPROVAL OF ITS PLAN FOR STRANDED
COST RECOVERY

DOCUMENT CONTROL

DOCKET NO. E-01345A-98-0473

IN THE MATTER OF THE FILING OF
ARIZONA PUBLIC SERVICE COMPANY OF
UNBUNDLED TARIFFS PURSUANT TO A.A.C.
R14-2-1061 ET.SEQ.

DOCKET NO. E-01345A-97-0773

IN THE MATTER OF COMPETITION IN THE
PROVISION OF ELECTRIC SERVICES
THROUGHOUT THE STATE OF ARIZONA

DOCKET NO. RE-00000C-94-0165

APPLICATION TO INTERVENE OF THE
ARIZONA TRANSMISSION DEPENDENT
UTILITY GROUP

The Arizona Transmission Dependent Utility Group¹, individually and collectively, applies to the Arizona Corporation Commission (Commission) for an order granting it leave to intervene in all phases of this proceeding initiated by Procedural Order dated May 25, 1999.

All of the members of the Arizona Transmission Dependent Utility Group have contractual and/or operational relationships with Arizona Public Service Company. All of the members of the Arizona Transmission Dependent Utility Group will be affected by any decision of the Commission with regard to the

¹ Aguila Irrigation District, Ak-Chin Indian Community, Buckeye Water Conservation and Drainage District, Central Arizona Water Conservation District, Electrical District No. 3, Electrical District No. 4, Electrical District No. 5, Electrical District No. 7, Electrical District No. 8, Harquahala Valley Power District, Maricopa County Municipal Water District No. 1, McMullen Valley Water Conservation and Drainage District, Roosevelt Irrigation District, City of Safford, Tonopah Irrigation District, Wellton-Mohawk Irrigation and Drainage District.

1 Application for Approval of Settlement Agreement ("Proposed Settlement")
2 filed by Arizona Public Service Company on May 17, 1999, having been executed
3 on May 14, 1999. Additionally, these entities will be impacted by the
4 precedential affect of any orders the Commission issues concerning the issues
5 raised by the Proposed Settlement and the manner in which it is to be
6 considered by the Commission.

7 The granting of this motion will not burden this proceeding or broaden
8 the issues articulated therein. Indeed, it was the very intent of the
9 Commission in providing notice to all parties to the electric competition
10 docket (Docket No. RE-00000C-94-0165) that such parties be invited to
11 intervene in this proceeding.

12 The Arizona Transmission Dependent Utility Group requests that
13 communications to it in connection with this proceeding be directed to:

14 Robert S. Lynch, Esq.
15 Attorney at Law
16 340 E. Palm Lane, Suite 140
17 Phoenix, Arizona 85004-4529
18 Phone: 602-254-5908
19 Fax: 602-257-9542
20 Email: RSLynchAty@aol.com

21 K.R. Saline
22 K.R. Saline & Associates
23 Consulting Engineers
24 160 N. Pasadena, Suite 101
25 Mesa, Arizona 85201-6764
Phone: 602-610-8741
Fax: 602-610-8796
Email: krs@krsaline.com

WHEREFORE, the Arizona Transmission Dependent Utility Group
respectfully requests that the Commission issue its order:

- 1) Granting this application to intervene; and
- 2) Granting such further and additional relief as the Commission deems
just.

1 RESPECTFULLY SUBMITTED this 27th day of May, 1999.

2
3 ARIZONA TRANSMISSION DEPENDENT
UTILITY GROUP

4
5 By 

6 Robert S. Lynch
Attorney at Law
340 E. Palm Lane, Suite 140
7 Phoenix, Arizona 85004-4529

8 Original and 10 copies of the
9 foregoing filed this 27th day
of May, 1999 with:

10 Docket Control
Arizona Corporation Commission
11 1200 West Washington Street
Phoenix, Arizona

12 Copies of the foregoing mailed
13 this 28th day of May, 1999,
to:

14 Service List for Docket No. RE-00000C-94-0165

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